

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
Western DIVISION

Sarah Lahti

(Enter Above the Name of the Plaintiff in this Action)

VS.

Consensys, Inc.

(Enter above the name of the Defendant in this Action)

If there are additional Defendants, please list them:

Alphabet, Inc.

#1:24CV183.

J. HOPKINS
M.J. BOWMAN

COMPLAINT

I. Parties to the action:

Plaintiff: Place your name and address on the lines below. The address you give must be the address where the court may contact you and mail documents to you. A telephone number is required.

Sarah Lahti

Name - Full Name Please - PRINT

Box 29069

Street Address

Cincinnati, Ohio 45229

City, State and Zip Code

513-886-3045

Telephone Number

If there are additional Plaintiffs in this suit, a separate piece of paper should be attached immediately behind this page with their full names, addresses and telephone numbers. If there are no other Plaintiffs, continue with this form.

Defendant(s):

Place the name and address of each Defendant you listed in the caption on the first page of this Complaint. This form is invalid unless each Defendant appears with full address for proper service.

1. Consensus, Inc.
Name - Full Name Please
5049 Edwards Ranch Rd Ft Worth, TX
Address: Street, City, State and Zip Code 76109
2. Alphabet, Inc.
1600 Amphitheatre Parkway Mountainview, CA
94043
3. _____
4. _____
5. _____
6. _____

If there are additional Defendants, please list their names and addresses on a separate sheet of paper.

II. Subject Matter Jurisdiction

Check the box or boxes that describes your lawsuit:

- ☒ Title 28 U.S.C. § 1343(3)
[A civil rights lawsuit alleging that Defendant(s) acting under color of State law, deprived you of a right secured by federal law or the Constitution.]
- ☒ Title 28 U.S.C. § 1331
[A lawsuit "arising under the Constitution, laws, or treaties of the United States."]
- ☒ Title 28 U.S.C. § 1332(a)(1)
[A lawsuit between citizens of different states where the matter in controversy exceeds \$75,000.]
- ☐ Title _____ United States Code, Section _____
[Other federal status giving the court subject matter jurisdiction.]

III. Statement of Claim

Please write as briefly as possible the facts of your case. Describe how each Defendant is involved. Include the name of all persons involved, give dates and places.

Number each claim separately. Use as much space as you need. You are not limited to the papers we give you. Attach extra sheets that deal with your statement claim immediately behind this piece of paper.

*please see attached typed, signed
complaint*

IV. Previous lawsuits:

If you have been a Plaintiff in a lawsuit, for each lawsuit state the case number and caption.
(Example, Case Number: 2:08-cv-728 and Caption: John Smith vs. Jane Doe).

Case Number

Caption

____ vs. _____
____ vs. _____
____ vs. _____

none

V. Relief

In this section please state (write) briefly exactly what you want the court to do for you. Make no legal argument, cite no case or statutes.

*please see attached typed, signed
complaint*

I state under penalty of perjury that the foregoing is true and correct. Executed on

this 2 day of April, 2024

Signature of Plaintiff

Jonh Lahti

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT CINCINNATI**

Sarah Lahti,
Box 29069
Cincinnati, Ohio 45229,

:

Case No. _____

On behalf of
Sarah Ann Lahti
Charitable Remainder Unitrust,
Box 29069
Cincinnati, Ohio 45229
Plaintiff.

:

Vs.

COMPLAINT

Consensys, Inc.
5049 Edwards Ranch Rd.
Fort Worth, TX, 76109

:

And

:

Alphabet, Inc.
1600 Amphitheatre Parkway,
Mountainview, CA, 94043,
Defendants.

:

-
1. Currently, the plaintiff is representing herself, pro se. Her current contact information is listed here as (513)886-3045, email gh_s92@protonmail.com.

2. Plaintiff is Sarah Lahti, a US citizen, and an adult residing in Cincinnati, Ohio. She is filing on behalf of Sarah Ann Lahti Charitable Remainder Unitrust, an Ohio trust, of which she is the trustee. Defendant#1 is Consensys, Inc., whose product, Metamask, is at issue here. Defendant#2, Alphabet, Inc., whose product, Google Chrome, and whose relationship to Defendant#1, and whose business practices are at issue here.
3. This court has jurisdiction as the amount in question is over \$75,000 USD, because it involves a dispute between residents of different states, and because there is a dispute involving federal law.
4. On February 9, 2024, the plaintiff alleges that crypto currency contained in the trust's Metamask wallet with a current value of approximately \$275,000. USD was stolen from the trust in some sort of computer hack. (value as of March 26, 2024, see Appendix A for full list of crypto currency tokens at issue here.) This theft represents a catastrophic loss to the Plaintiff. Plaintiff states that she did not realize that the funds had been stolen until approximately two weeks after the fact, as she had no reason to think there was a problem.
5. Further, that this happened while she was on vacation in Kuwait City, Kuwait. Plaintiff states that she took necessary security precautions surrounding her use of the Metamask wallet, including that she never gave her wallet information, including password, seed phrase, and login ID, out to anyone at anytime before the alleged security breach of the wallet. In addition,

plaintiff used a VPN throughout the course of her trip to Kuwait.

6. Plaintiff alleges that she never initiated any Metamask transactions on February 9, 2024, and yet, transactions occurred out of the wallet that lead to the theft of the crypto currency tokens in question. Because of the more permanent nature of the block chain technology used here, it is fairly easy to ascertain that these transactions occurred and that the plaintiff did not initiate them, nor have any knowledge of them.
7. Plaintiff notes that she contacted Metamask through their customer support system, so they have had approximately a month to rectify this situation, and have not. In addition, Plaintiff notes that she has already opened a case with the FBI.
8. Plaintiff further alleges that both Metamask and Google have violated her civil rights through breach of contract, 41 USC § 6503, with a financial product that is unsafe and faulty and not fit for public use; yet, Metamask is falsely advertised as being safe. Further, that Metamask and Google are operating an unlicensed financial product that engages in unfair and deceptive acts and practices, and skirts aspects of the consumer protection act, and that they have a fiduciary responsibility to their clients to protect client assets appropriately.
9. Plaintiff asserts her constitutional right to a jury trial.
10. Plaintiff seeks restitution as follows:
 - a) \$10 million dollars compensatory damages

- b) a charitable trust set up and funded for the purpose of crypto, computer, and mobile phone safety, privacy, and consumer protection to be run and overseen by the Plaintiff**
- c) \$2 billion dollars in punitive damages**
- d) all costs arising from court costs, fees, etc. from this case**

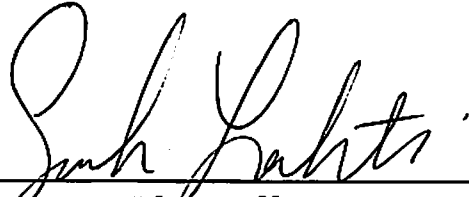
- b) a charitable trust set up and funded for the purpose of crypto, computer, and mobile phone safety, privacy, and consumer protection to be run and overseen by the Plaintiff**
- c) \$2 billion dollars in punitive damages**
- d) all costs arising from court costs, fees, etc. from this case**

Appendix A

List of crypto currency tokens allegedly stolen, and value as of March 26, 2024

No. of coins	symbol/ID	USD value as of 3/26/24*
204,554.78	USDT	\$204,554.78
6.0	ETH	\$21,344.52
8284.85	USDC	\$8,284.85
115,845,278.21	SHIB	\$3,434.81
1733.612	MATIC	\$1,785.62
72,346.183	BFC	\$6,583.50
2,189,134.21	TEL	\$8,290.25
68701.858	CELR	\$2,344.79
96,902.995	HEX	\$225.30
975.116	POLS	\$1,062.88
16,188.48	PHA	\$4,969.87
308.19	1INCH	\$185.06
33.862	ORAI	\$477.16
1853.333	GRT	\$727.62
117.352	PERP	\$184.24
158.688	PDEX	\$135.98
2389.574	POLK	\$101.08
2.98	ETH	\$10,651.77
	subtotal	<hr/> \$275,334.08

*as per widely used/accepted crypto currency website www.coingecko.com



Signature, Plaintiff

4/2/24

Date

Sarah Lahti
PO Box 29069
Cincinnati, Ohio
45229
(513)886-3045
gh_s92@protonmail.com